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6 Attorney for Ronald Harris

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**  
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 RONALD HARRIS,

14 Defendant.

Case No. 2:09-cr-223-GMN-LRL

**STIPULATION TO CONTINUE**  
**REVOCATION HEARING**

(Sixth Request)

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,  
17 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the  
18 United States of America, and Rene L. Valladares, Federal Public Defender, and  
19 Monique Kirtley, Assistant Federal Public Defender, counsel for Ronald Harris, that the  
20 Revocation Hearing currently scheduled on March 3, 2017 at 10:00 a.m., be vacated and  
21 continued to a date and time convenient to the Court, but no sooner than sixty (60) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. The defendant is in custody and does not oppose the continuance.
- 24 2. On January 19, 2016, Mr. Harris was indicted for possession with intent to
- 25 distribute, in case number 2:16-cr-014-GMN-CWH.
- 26

1           3.       On May 25, 2016, a motion to suppress was filed in case number 2:16-cr-014-  
2 GMN-CWH. An evidentiary, on the motion to suppress, was conducted on May 25, 2016. On  
3 June 30, 2016, the Magistrate Judge entered a Report and Recommendation. (CR#17). On  
4 November 14, 2016 this Court adopted the Magistrate Judge's Report and Recommendation.

5           4.       The revocation hearing on case 2:09-cr-223-GMN-LRL is currently scheduled  
6 for March 3, 2017. The trial in case 2:16-cr-014-GMN-CWH is currently scheduled for May  
7 8, 2017. The revocation petition is inextricably linked to case 2:16-cr-014-GMN-CWH. The  
8 criminal indictment and the revocation petition allege the same criminal conduct.

9           5.       Additionally, the parties are negotiating a resolution for both cases.

10          6.       The additional time requested herein is not sought for purposes of delay, but  
11 merely to allow for the complete resolution of the trial in 2:16-cr-GMN-CWH prior to the  
12 hearing on the revocation petition.

13               This is the sixth request for a continuance of the revocation hearing.

14               DATED this 28<sup>th</sup> day of February, 2017.

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16       RENE L. VALLADARES  
17       Federal Public Defender

16       DANIEL G. BOGDEN  
17       United States Attorney

18       /s/ Monique Kirtley  
19       By \_\_\_\_\_

18       /s/ Robert Knief  
19       By \_\_\_\_\_

20       MONIQUE KIRTLEY  
21       Assistant Federal Public Defender

20       ROBERT KNIEF  
21       Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 RONALD HARRIS,

7 Defendant.

Case No. 2:09-cr-223-GMN-LRL

**ORDER**

9  
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for  
11 Friday, March 3, 2017 at 10:00 a.m., be vacated and continued to May 12, 2017 at the  
12 hour of 10:30 a.m.; or to a time and date convenient to the court.

13 DATED this 28th day of February, 2017.

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16 UNITED STATES DISTRICT JUDGE  
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